

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION,
OF MASSACHUSETTS and
AMERICAN OVERSIGHT,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.

Civil Action No. 21-10761-AK

STIPULATION OF DISMISSAL

Plaintiffs American Civil Liberties Union of Massachusetts and American Oversight, and Defendant United States Immigration and Customs Enforcement (“ICE”), (collectively, “the Parties”), by and through their respective counsel, hereby stipulate to the dismissal of this action in its entirety and with prejudice pursuant to Federal Rule of Civil Procedure 41(a) following the Parties’ entry into a Settlement Agreement on or about January 5, 2024. Each Party shall bear their own costs and fees except as otherwise provided in the Settlement Agreement.

This Court shall retain jurisdiction over the litigation only for the purpose of enforcing the Settlement Agreement. Any action to enforce the Settlement Agreement must be commenced within 120 days of the execution of the Settlement Agreement, absent mutual agreement of the Parties or exceptional circumstances that could not be anticipated or avoided. An example of such a circumstance that would potentially justify extending the 120 day period would be a shutdown of the federal government.

Dated: January 5, 2024

/s/ Thomas E. Kanwit

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Respectfully submitted,

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